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Department of Education

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE:

EMILY ANN LEE,  
Debtor

EMILY ANN LEE,  
Plaintiff,

v.

THE U.S. DEPARTMENT OF  
EDUCATION,  
Defendant.

Case Number: 21-40619-ELM  
(Chapter 7)

Adv. No. 21-04047-ELM

**STIPULATION FOR ENTRY OF AGREED JUDGMENT**

It is hereby stipulated to and agreed to by and between Emily Ann Lee and Defendant the United States Department of Education, that the parties seek the entry of an Agreed Judgment by this Court, and in support thereof, the parties state:

1. On March 23, 2021, Lee commenced the above-captioned bankruptcy case by filing a petition under Chapter 7 of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”).

2. On July 19, 2021, Lee commenced the commenced the above-captioned adversary proceeding (the “Adversary Proceeding”) against the U.S. Department of Education by filing the Complaint to Determine Dischargeability, *see* Adv. Pro. ECF No. 1 (the “Complaint”).

3. In the Complaint, Lee seeks to seeks to discharge, pursuant to 11 U.S.C. 523(a)(8), certain student loan debt identified on Education’s Certificate of Indebtedness, which is attached hereto as Exhibit A (the “Student Loan Debt”).

4. In May 2023, Lee, pursuant to the November 17, 2022, Guidance for Department Attorneys Regarding Student Loan Bankruptcy Litigation, submitted an Attestation in Support of Request for Stipulation Conceding Dischargeability of Student Loans (the “Attestation”).

5. After reviewing the Attestation, Education agrees that the Court should discharge, pursuant to 11 U.S.C. § 523(a)(8), the Student Loan Debt.

6. The parties desire to amicably resolve the matters at issue in this Adversary Proceeding and, therefore, have agreed to enter into the Agreed Judgment attached hereto as Exhibit B.

The parties hereby respectfully request that the Court enter the Agreed Judgment attached hereto as Exhibit B.

DATED January 24, 2024.

Respectfully submitted,

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

THE PRITCHARD LAW FIRM, PLLC

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Certificate of Service

On January 24, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. Bankruptcy Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Dawn Whalen Theiss  
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Assistant United States Attorney